

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.

Plaintiffs,

vs.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

Case No. 24-cv-00040-EAW-MJR

**NOTICE OF RECEIVER'S CROSS-MOTION TO  
ADD NEW RECEIVERSHIP DEFENDANTS**

Moving Party:	Receiver, Thomas W. McNamara
Directed To:	All parties in interest.
Date and Time:	As soon as practicable.
Place:	Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202
Supporting Papers:	Receiver's Response to Cross-Motion Requesting an Order Directing the CFPB and Receiver to Sell Property, Make Capital Calls, and Release Funds (Dkt. No. 533) and Receiver's Cross-Motion to Add New Receivership Defendants; supporting Declaration of Stacy Elledge Chiang.
Relief Requested:	An Order adding the following entities as Receivership Defendants: (1) Fusion Capital, LLC; (2) Axel Development Sag Harbor LLC; (3) MyG Investments, LLC; (4) T.C.I.G., LLC; and (5) Timberline Capital, LLC. <b>A Proposed Order is filed herewith.</b>

Grounds for Relief:

Preliminary Injunction (Dkt. No. 184) and Court's Equitable Authority.

Oral Argument:

Waived by the Receiver.

Dated: February 18, 2025

**MCNAMARA SMITH LLP**

By: /s/ Logan D. Smith

Logan D. Smith (*Pro Hac Vice*)

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